ATTACHMENT A AGRIUM KNO FACILITY CONTINUOUS RELEASE-EMERGENCY RESPONSE NOTIFICATION SYSTEM REPORT

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Agri		Attachment	TO LOT-	Envorsa	
1		Alinformation	CP_EDNS	S Number: 44607	
SECTION	1. GENERAL		CK-EATIS	5 14umber: 44007	
Date of Init	ial Release:		Date of Ini	tial Call to NRC: 10/23/90	
Type of Rep	ort: Indicate be	elow the type of report you are sub	mitting.		
		First Anniversary	Written Notif	fication Written Notification	
Initial Wi	ritten Notification	Follow-up	X of a Change t		
		Report	Initial Notific	cation Follow-up Report	
Signed State	ore on the Tarable	. 4t . 4 . 1 t 1 1 . 4	1	12	
Signed Statement: I certify that the hazardous substances releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.4(a)(2)(iii) and that all submitted information is					
accurate and current to the best of my knowledge.					
M. L. Nugent, Plant Manager					
Name and Position					
8/13/99 met vaent					
Date Signature					
Part A. Facility or Vessel Information					
Name of Facility or Vessel Alaska Nitrogen Products LLC					
		Kenai Plant	LEC		
Person					
in Charge	Position Plant Manager Telephone No. (907) 776-8121 Alternate Telephone No. () None Facility				
A **					
Facility Address or					
Vessel	Bucci Wille 21	Sput Highway	County	Konari omisua Borough	
Port of	City Kenai State AK Zip Code 99611			AK Zip Code 99611	
Registration					
Dun and Brad	lstreet Number	for Facility 092876390			
Facility/Vessel		Deg N <u>60</u> Min <u>40</u>	Sec <u>22</u>	Vessel LORAN Coordinates	
Location	Longitude	Deg W <u>151</u> Min <u>22</u>	Sec <u>36</u>		
Part B. Population Information					
Choose the range that describes the population density within a one-mile radius of your facility or vessel					
Population Density	(Indicate by placing an "X" in the appropriate blank below.)				
	<u> </u>	0 - 50 persons	501 - 1000 persons	more than 1000 persons	
Sensitive	Q ₀	nsitive Populations or Ecosyste	ms	Distance and direction from facility	
Populations		, hospitals, wetlands, wildlife p		Distance and direction from facility	
and Prosvetoms					
Ecosystems Within one	NONE				
—Mile Radius—					

ess	EACH source of a release of a hazarde sel, provide the following information of essary. The essary Plant #1, CO2 Vent, D-107			-		₩
1.	Indicate whether the release from this source is e	ither:				
	continuous without interruption	OR	routine, antic	pated, inter	mittent	X
	If malfunction, describe the malfunction and exp continuous and stable in quantity and rate.*	olain why	the release Hor	n me mant	inchon shou	id be considered
		lain why	the release nor	n me mane	inction shou	id be considere
	continuous and stable in quantity and rate.*	lain why	the release nor	ii the mant	inction shou	id be considere
	continuous and stable in quantity and rate.*	lain why	the release not	ii the mant	inction shou	id be considere
3	continuous and stable in quantity and rate.* Ammonia production					id be considere
3.	Ammonia production Identify below how you established the pattern of X Past release data Knowledge	f release			nates.	ring estimate

CR-ERNS Number

SECTION II:

SOURCE

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II: SOURCE CR-ERNS Number INFORMATION 44607 (continued) Name of Source: Plant #1 CO2 Vent. D-107 Part B: Specific Information on the Source For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source, Photocopy this page if necessary. AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected. O AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source. If identified source is a stack, indicate stack height: 85 feet or meters; OR If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: ____ square feet or square meters. O SURFACE WATER _____ (stream _____, lake _____, or other ____ If the release affects any surface water body, give the name of the water body. If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: _____ or average flow rate: ____ cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: ____ acres and average depth of lake: ___ meters.

O SOIL OR GROUND WATER __

If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

- For a stack release to air, provide the following information, if available:

 Inside diameter 2.5 feet or meters

 Gas Exit Velocity 38 feet/second or meters/seconds
- For a release to surface water, provide the following information, if available:
 Average Velocity ______ feet/second of Surface Water
- Gas Temperature 105 degrees Fahrenheit,
 -Kelvin, or Celsius

CR-ERNS Number	44607	
SOURCE INFORMATION	(continued)	
SECTION II:		

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Name of Source: Plant #1, CO2 Vent, D-107

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of the Release Months of AII Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.) Released in Previous Year (in lbs. or kg)* Total Quantity 7300 of Releases (per year) Number 365 Lower Bound (in lbs. or kg per day)* Normal Range 00 Upper Bound 48 7664-41-7 CASRN# Mame of Hazardous Substance Ammonia

list each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)

(per year) Number (in lbs. or kg per day)* Normal Range of Upper Lower Bound Bound Mixture (in lbs. or kg per day)* Normal Range of Components Upper Lower Bound Bound Percentage Weight CASRN# Components Hazardous Substance Name of Name of Mixture

Release

Months of the

Total Quantity of Mixture Released

in Previous Year (in Ibs. or kg)

N/A

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

SECTION II:	SOURCE
	INFORMATION

CR-ERNS Number

44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

	cosui y.			
Na	ame of Source: Plant #1, Dearator,	, F-105		
1.	Indicate whether the release from this	source is either:		
	continuous without interruption	X OR	routine, anticipate	d, intermittent
2.	Identify the activity(ies) that results in If malfunction, describe the malfuncticontinuous and stable in quantity and results.	on and explain why		
•	Ammonia production			
3.	Identify below how you established th	e pattern of release a	and calculated releas	se estimates.
	X Past release data	_Knowledge of the soperations and rele		X Engineering estimate
	AP-42 test	_Best professional j	udgment	Other (explain)
				·
				-
			,	

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II:

SOURCE

INFORMATION

(continued)

CR-ERNS Number

44607

Name of Source: Plant #.	Dearator, F-105
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Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to **EACH** medium as a separate source and complete Section II, Parts A, B, and C, of this format for **EACH** medium affected.

AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.
If identified source is a stack, indicate stack height: feet or meters; OR
 If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.
SURFACE WATER (stream, lake, or other) If the release affects any surface water body, give the name of the water body.
 If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR If the release affects a lake, give the surface area of the lake in acres and the average depth in meters. surface area of lake: acres and average depth of lake: meters.
O SOIL OR GROUND WATER If the release is on or under ground, indicate the distance to the closest water well.

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

-Kelvin, or Celsius

- For a release to surface water, provide the following information, if available:
 Average Velocity ______feet/second of Surface Water

Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Plant #1, Dearator, F-105 Name of Source: List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of the Release Months of AII Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.) Released in Previous Year Total Quantity (in lbs. or kg)* 8,030 of Releases (per year) Number 365 Lower Bound (in lbs. or kg per day)* Normal Range 22 Upper Bound 22 7664-41-7 CASRN# Name of Hazardous Substance Ammonia

list each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – ${
m A}$ Guide for Facilities and Vessels on Compliance.)

			-	Normal Kange of	Normal Kange of		
	Name of			Components	Mixture		Total Quantity of
	Hazardous			(in lbs. or kg per day)*	(in lbs. or kg per day)*	Number	Mixture Released
:	Substance		Weight	Upper Lower	Upper Lower	of Releases	in Previous Year
Name of Mixture	Components	CASRN#	Percentage	Bound Bound	Bound Bound	(per year)	(in lbs. or kg)

Release

Months of the

N/A

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.



SECTION II:	SOURCE
	INFORMATION

CR-ERNS Number

44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

recessary.		
Name of Source: Plant #1, Fat F	Flasher Vent, F-113	
1. Indicate whether the release from	this source is either:	
continuous without interruption _	X OR routine, anticipate	ed, intermittent
	Its in the release from this source (e.g., bate unction and explain why the release from th and rate.*	
Ammonia production		
		,
3. Identify below how you establish	ed the pattern of release and calculated relea	se estimates.
X Past release data	Knowledge of the facility/vessel's operations and release history	X Engineering estimate
AP-42 test	Best professional judgment	Other (explain)

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II:

SOURCE

INFORMATION

(continued)

CR-ERNS Number

44607

Name of Source:	Plant #1	Fat Flasher	Vent, F-113
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Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

O AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.						
If identified source is a stack, indicate stack height:36 feet or meters; OR						
If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.						
O SURFACE WATER (stream, lake, or other)						
If the release affects any surface water body, give the name of the water body.						
If the release affects a stream, give the stream order or average flow rate, in cubic feet per second.						
stream order: or average flow rate: cubic feet/second; OR						
If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.						
surface area of lake: acres and average depth of lake: meters.						
O SOIL OR GROUND WATER If the release is on or under ground, indicate the distance to the closest water well.						

Optional Information

The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

-Kelvin, or Gelsius

•	For a stack release t information, if avai	to air, provide the following lable:
	Inside diameter	1.8 feet or meters
	Gas Exit Velocity	Unknown feet/second or
	·	meters/seconds
	Gas Temperature	<u> </u>

For a release to surface water, provide the following information, if available: Average Velocity _____ feet/second of Surface Water

<u>v</u>	SECTION II.	SOURCE INFORMATION	INFORM	ATION				CR-ERN	CR-ERNS Number	
)	; ; ; ;	(continued)	1)					44	44607	
Pan Ple	Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.	nd Quantit	y of Each	Hazardous ACH sourc	Substance or	Mixture Rethis page if n	leased Fro	m Each So	urce	
Z	Name of Source:	Plant #1, Fa	Plant #1, Fat Flasher Vent, F-113	ent, F-113						
	List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)	substance rel	eased from t	he source iden	tiffied above and plous Substances	rovide the folla A Guide for Fa	wing inform	ation. (For an	n example, see Tal	le 1 of
F-1	Name of Hazardous Substance	<u>ostance</u>	CASRN#	Norm (in lbs. or Upper Bound	Normal Range (in lbs. or kg per day)* r Bound Lower Bound	Number of Releases (per year)	Total Released ir (in 1b	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release	را د
	Ammonia	76	7664-41-7	9	9	365	7	2,190	All	
	<u>.</u>	:								
	List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)	leased from the	he source ide	ntified above ardous Substa	and provide the founces – A Guide fo	llowing inform r Facilities and	ation. (For a Vessels on C	ın example, se ompliance.)	e Table 2 of Repor	ting
 - - - - - - - - -	Name of Mixture C	Name of Hazardous Substance Components	CASRN#	Weight <u>Percentage</u>	Normal Range of Components (in lbs. or kg per day)* Upper Lower Bound Bound	Normal Range of Mixture * (in lbs. or kg per day)* Upper Lower Bound Bound		Number of Releases (per year)	Total Quantity of Mixture Released in Previous Year (in lbs. or kg)	Months of the <u>Release</u>
	N/A									
*	Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.	tde units where	appropriate.	Also, if the relea	se is a radionuclide,	units of curies (C	T) are appropr	iate.		

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SECTION II:	SOURCE
	INFORMATION

CR-ERNS Number	
44607	

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Na	me of Source: Plant #1, Wet Reformed Gas Vent, F-130
1.	Indicate whether the release from this source is either:
	continuous without interruption OR routine, anticipated, intermittent X
2.	Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*
	Start-up of ammonia plant.
ι [
<u>з</u> .	Identify below how you established the pattern of release and calculated release estimates.
	Past release dataKnowledge of the facility/vessel'sX Engineering estimate operations and release history
	AP-42 testBest professional judgmentOther (explain)

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II:

SOURCE

INFORMATION

(continued)

CR-ERNS Number

44607

Name of Source: Plant #1 Wet Reformed Gas Vent, F-130
Part B: Specific Information on the Source For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.
AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.
O AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.
If identified source is a stack, indicate stack height: feet or meters; OR
If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.
O SURFACE WATER (stream, lake, or other)
If the release affects any surface water body, give the name of the water body.
If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR
• If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.
O SOIL OR GROUND WATER
If the release is on or under ground, indicate the distance to the closest water well.
Optional Information
The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.
 For a stack release to air, provide the following information, if available: Inside diameter feet or meters For a release to surface water, provide the following information, if available: Average Velocity feet/second

of Surface Water

Unknown feet/second or

meters/seconds 400 degrees Fahrenheit,

-Kelvin, or Celsius

Gas Exit Velocity

Gas Temperature

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Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.

Plant #1 Wet Reformed Gas Vent, F-130

Name of Source:

Does not correspond to there is a plant startup. List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of Occurs whenever particular month. the Release Months of Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.) Released in Previous Year Total Quantity (in lbs. or kg)* 2,190 Approx. 2 of Releases (per year) Number Lower Bound (in lbs. or kg per day)* Normal Range 0 Upper Bound 6,200 7664-41-7 CASRN# Name of Hazardous Substance Ammonia

list each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)

(in lbs. or kg per day)* Normal Range of Upper Lower Bound Bound (in lbs. or kg per day)* Normal Range of Components Upper Lower Bound Bound Percentage Weight CASRN# Components Hazardous Substance Name of Name of Mixture

Months

Total Quantity of Mixture Released in Previous Year (in lbs. or kg)

of Releases

Number

(per year)

of the Release

N/A

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

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